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August 31, 2022

VIA ECF

Honorable Richard M. Berman
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Daniel Carino, No. 21-cr-00598 (RMB)

Dear Judge Berman:

We are the attorneys for Daniel Carino. The current deadline to file pretrial motions, motions in limine, draft jury charges and proposed voir dire is September 1, 2022. However, the parties are engaged in ongoing discussions concerning a potential pretrial resolution, and respectfully seek additional time to continue those discussions before the upcoming deadline. We request that the filing deadline be extended two weeks to September 15, 2022. The government consents to this request.

For the Court's convenience, we have included a "So Ordered" line should the Court grant our request. Thank you for your consideration.

Respectfully submitted,

/s/ Eric R. Breslin

Eric R. Breslin

cc: All Counsel of Record (Via ECF)

SO ORDERED



Honorable Richard M. Berman, U.S.D.J.